

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

WNT, LLC, *et al.*,

Case No. 24-cv-00959 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

MORELOS BAKERY LLC,

Case No. 24-cv-00966 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

UP AT 4, INC.,

Case No. 24-cv-00970 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

QUARTERBACK CLUB, *et al.*,

Case No. 24-cv-01017 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

BW-SS, INC.,

Case No. 24-cv-01047 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

BOCA BOTANA'S INC.,

Case No. 24-cv-01106 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

KING KULLEN GROCERY CO., INC.,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01122 (JMB/ECW)

RALEIGH GOLDEN,

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

Case No. 24-cv-01129 (JMB/ECW)

PIALA LLC,

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

Case No. 24-cv-01232 (JMB/ECW)

THE UNION PUBLIC HOUSE, LLC,

Case No. 24-cv-01292 (JMB/ECW)

Plaintiff,

v.

AMERICAN SUGAR REFINING, INC.,
et al.,

Defendants.

WILSON COFFEE HOUSE, LLC,

Case No. 24-cv-01322 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

CORBOS DELI SOUTHSIDE, LLC, *et al.*,

Case No. 24-cv-01370 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

NORTHERN FROZEN FOODS, INC.,

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

Case No. 24-cv-01414 (JMB/ECW)

NINETEENSEVENTYNINE LLC, *et al.*,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01525 (JMB/ECW)

TRIPLE ELM COFFEE AND ICE
CREAM, LLC,

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

Case No. 24-cv-01536 (JMB/ECW)

MODERN PASTRY SHOP, INC.,

Case No. 24-cv-01537 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

COWBELL GRILL & TAP, LLC, *et al.*,

Case No. 24-cv-01539 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

PORLAND HUNT-ALPINE CLUB,
LLC,

Case No. 24-cv-01560 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

WESTERN AXE LLC,

Case No. 24-cv-01653 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

NATILE INC, *et al.*,

Case No. 24-cv-01654 (JMB/ECW)

Plaintiff,

v.

AMERICAN SUGAR REFINING, INC.,
et al.,

Defendants.

MARY SALAZAR, *et al.*,

Case No. 24-cv-01847 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE., *et al.*,

Defendants.

PATTIBAKES LLC,

Plaintiff,

v.

AMERICAN SUGAR REFINING, INC.,
et al.,

Defendants.

Case No. 24-cv-01847 (JMB/ECW)

JENNIVEE'S BAKERY, LLC,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01848 (JMB/ECW)

2nd PITT LLC,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01859 (JMB/ECW)

HU-YU, INC. d/b/a CITY WOK,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01903 (JMB/ECW)

JM HOSPITALITY GROUP, LLC,

Plaintiff,

v.

AMERICAN SUGAR REFINING, INC.,
et al.,

Defendants.

Case No. 24-cv-01907 (JMB/ECW)

KLUESSENDORF,

Plaintiff,

v.

UNITED SUGAR PRODUCERS &
REFINERS COOPERATIVE, *et al.*,

Defendants.

Case No. 24-cv-01913 (JMB/ECW)

KEDZIE BOULEVARD CAFÉ, INC.,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC.,
et al.,

Defendants.

Case No. 24-cv-01949 (JMB/ECW)

**PLAINTIFFS' JOINT MOTION
TO CONSOLIDATE AND COORDINATE ACTIONS**

Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs move for consolidation and coordination of the above-captioned actions as more fully described in the accompanying memorandum of law. This motion is based on the memorandum, the arguments of counsel, and all files, records, and proceedings herein.

Respectfully submitted,

DATED: May 29, 2024

/s/ Daniel C. Hedlund

Daniel E. Gustafson (#202241)

Daniel C. Hedlund (#258337)

Michelle J. Looby (#0388166)

Joshua J. Rissman (#0391500)

Anthony J. Stauber (#0401093)

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 So. Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: (612) 333-8844

Fax: (612) 339-6622

dgustafson@gustafsongluek.com

dhedlund@gustafsongluek.com

mlooby@gustafsongluek.com

jrißman@gustafsongluek.com

tstauber@gustafsongluek.com

Dianne M. Nast
Daniel N. Gallucci
Joseph N. Roda
Michele S. Burkholder
Michael S. Tarringer
NASTLAW LLC
1101 Market Street, Suite 2801
Philadelphia, Pennsylvania 19107
Tel: (215) 923-9300
Fax: (215) 923-9302
dnast@nastlaw.com
dgallucci@nastlaw.com
jnroda@nastlaw.com
mburkholder@nastlaw.com
mtarringer@nastlaw.com

Christopher V. Le
Brian P. Drockton
BOIESBATTIN LLP
4041 University Drive, 5th Floor
Fairfax, VA 22030
Tel: (703) 764-8700
Fax: (703) 764-8704
cle@boiesbattin.com
bdropkton@boiesbattin.com

Kenneth A. Wexler (admitted *pro hac vice*)
Justin N. Boley (admitted *pro hac vice*)
WEXLER BOLEY & ELGERSMA LLP
311 S. Wacker Dr., Suite 5450
Chicago, IL 60606
Telephone: (312) 346-2222
kaw@wbe-llp.com
jnb@wbe-llp.com

Adam J. Zapala (admitted *pro hac vice*)
Elizabeth Castillo (admitted *pro hac vice*)
James G.B. Dallal (admitted *pro hac vice*)
COTCHETT, PITRE & MCCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010

Tel: (650) 697-6000
azapala@cpmlegal.com
ecastillo@cpmlegal.com
jdallal@cpmlegal.com

Alexander E. Barnett (admitted *pro hac vice*)
COTCHETT, PITRE & MCCARTHY, LLP
40 Worth Street, Ste. 602
New York, NY 10013
Tel: (212) 201-6820
abarnett@cpmlegal.com

Counsel for Plaintiff Northern Haserot

/s/ Bobby Pouya
Bobby Pouya
PEARSON WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
T: (818) 788-8300
F: (818) 788-8104
bpouya@pwfirm.com

Counsel for Consumer Class Plaintiffs
Raleigh Golden, Mary Salazar, Liana Britt,
Kimberly Rybarczyk, Amanda Boardman, and
Virginia Smith

/s/ Kellie Lerner
Kellie Lerner
Ben Steinberg
Ellen Jalkut
Laura Song
ROBINS KAPLAN LLP
1325 Avenue of the Americas, Suite 2601
New York, NY 10019
Tel: (212) 980-7400
Fax: (212) 980-7499
klerner@robinskaplan.com
bsteinberg@robinskaplan.com
ejalkut@robinskaplan.com

lsong@robinskaplan.com

Counsel for Plaintiffs Natile, Inc., Red Star Diner, Inc., The Coffee Bean LLC, Morelos Bakery LLC, WNT, LLC, and WNT Farmington LLC

/s/ Kimberly A. Justice

Kimberly A. Justice
Jonathan M. Jagher
FREED KANNER LONDON & MILLEN LLC
923 Fayette Street
Conshohocken, Pennsylvania 19428
Telephone: (610) 234-6486
kjustice@fkmlaw.com
jjagher@fkmlaw.com

Matthew W. Ruan
Douglas A. Millen
Michael E. Moskovitz
FREED KANNER LONDON & MILLEN LLC
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Telephone: (224) 632-4500
mruan@fkmlaw.com
dmillen@fkmlaw.com
mmoskovitz@fkmlaw.com

Counsel for Plaintiffs WNT, LLC and WNT Farmington, LLC

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X)
Jessica N. Servais (MN #0326744)
Joseph C. Bourne (MN #0389922)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900

Fax: (612) 339-0981
hmsilton@locklaw.com
jnservais@locklaw.com
jcbourne@locklaw.com

Counsel for Plaintiff Morelos Bakery LLC

/s/ David M. Cialkowski

David M. Cialkowski (MN# 0306526)
Ian F. McFarland (MN# 0392900)
Zachary J. Freese (MN# 0402252)
ZIMMERMAN REED, LLP
1100 IDS Center
80 S. 8th St.
Minneapolis, MN 55402
Tel: (612) 341-0400
Fax: (612) 341-0844
david.cialkowski@zimmreed.com
ian.mcfarland@zimmreed.com
zachary.freese@zimmreed.com

*Counsel for Plaintiffs BW-SS, Inc.,
Nineteenseventynine LLC, Sublime Surprise,
LLC, and Jennivee's Bakery, LLC*

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X)
Jessica N. Servais (MN #0326744)
Joseph C. Bourne (MN #0389922)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
hmsilton@locklaw.com
jnservais@locklaw.com
jcbourne@locklaw.com

W. Cameron Stephenson
Matthew D. Schultz
LEVIN, PAPANTONIO, RAFFERTY,

**PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGEY, P.A.**
316 S. Baylen Street, Suite 600
Pensacola, FL 32502-5996
Tel: (850) 435-7176
Fax: (850) 436-6176
cstephenson@levinlaw.com
mschultz@levinlaw.com

***Counsel for Plaintiff THE UNION PUBLIC
HOUSE, LLC***

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X)
Jessica N. Servais (MN #0326744)
Joseph C. Bourne (MN #0389922)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
hmsilton@locklaw.com
jnservais@locklaw.com
jcbourne@locklaw.com

Jeffrey B. Gittleman
Meghan J. Talbot
Zachary A. Pogust
POGUST GOODHEAD LLC
161 Washington Street, Suite 250
Conshohocken, PA 19428
Telephone: (610) 941-4204
jgittleman@pogustgoodhead.com
mtalbot@pogustgoodhead.com
zpogust@pogustgoodhead.com

Kevin I. Goldberg
GOLDBERG LAW, LLC
401 Salk Circle
Gaithersburg, MD 20878
Telephone: (301) 343-5817
kg@goldberglaw.info

Counsel for Plaintiff BOCA BOTANA'S INC.

/s/ Anne T. Regan

Anne T. Regan (MN #0333852)
Nathan D. Prosser (MN #0329745)
Brian W. Nelson (MN #0398481)
HELLMUTH & JOHNSON, PLLC
8050 West 78th Street
Edina, Minnesota 55439
Telephone: (952) 941-4005
Facsimile: (952) 941-2337
aregan@hjlawfirm.com
nprosser@hjlawfirm.com
bwnelson@hjlawfirm.com

Daniel Zemans (pro hac vice forthcoming)
**LAW OFFICES OF DANIEL ZEMANS,
LLC**
2023 W. Berteau Ave.
Chicago, IL 60618
Phone: (773) 706-7767
dzemans@zemans-law.com

*Counsel for Plaintiffs Western Axe LLC (d/b/a
Mo's House of Axe) and Kedzie Boulevard
Café, Inc. (d/b/a Scofflaw)*

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X)
Jessica N. Servais (MN #0326744)
Joseph C. Bourne (MN #0389922)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
hmsilton@locklaw.com
jnservais@locklaw.com
jcbourne@locklaw.com

Brian Murray (*pro hac vice* forthcoming)
Lee Albert (*pro hac vice* forthcoming)
Gregory Linkh (*pro hac vice* forthcoming)
GLANCY PRONGAY & MURRAY LLP
230 Park Avenue, Suite 358
New York, NY 10169
Tel: (212) 682-5340
Fax: (212) 884-0988
bmurray@glancylaw.com
lalbert@glancylaw.com
glinkh@glancylaw.com

Counsel for Plaintiffs CORBOS DELI SOUTHSIDE, LLC; and CORBO CORNER DELI, WEST LLC, and PATTIBAKES LLC

/s/ Garrett D. Blanchfield
Garrett D. Blanchfield
Brant D. Penney
REINHARDT WENDORF & BLANCHFIELD
80 South 8th Street, Suite 900
Minneapolis, MN 55402
Telephone: (651) 287-2100
g.blanchfield@rwblawfirm.com
b.penney@rwblawfim.com

Counsel for Plaintiff Sandra Kluessendorf

/s/ Heidi M. Silton
Heidi M. Silton (MN #025759X)
Jessica N. Servais (MN #0326744)
Joseph C. Bourne (MN #0389922)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
hmsilton@locklaw.com
jnservais@locklaw.com
jcbourne@locklaw.com

Bryan L. Clobes (pro hac vice forthcoming)
Ellen Meriwether (pro hac vice forthcoming)
Daniel J. Herrera (pro hac vice forthcoming)
Mohammed Rathur (pro hac vice forthcoming)

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

135 South LaSalle Street, Suite 3210
Chicago, IL 60603
T: (312) 782-4880
bclobes@caffertyclobes.com
emeriwether@caffertyclobes.com
dherrera@caffertyclobes.com
mrathur@caffertyclobes.com

*Counsel for Plaintiff Hu-Yu, Inc. (d/b/a City
Wok)*

/s/ Heidi M. Silton

Heidi M. Silton
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401-2159
Tel: (612) 596-4092
E-mail: hmsilton@locklaw.com

David E. Kovel (pro hac vice forthcoming)
Thomas W. Elrod (pro hac vice forthcoming)
David Bishop (pro hac vice forthcoming)

KIRBY McINERNEY LLP

250 Park Avenue
Suite 820
New York, NY 10177
Tel: (212) 371-6600
E-mail: dkovel@kmllp.com
telrod@kmllp.com

Anthony F. Fata (pro hac vice forthcoming)
Anthony E. Maneiro (pro hac vice forthcoming)

KIRBY McINERNEY LLP

211 West Wacker Drive, Suite 550
Chicago, IL 60606

Tel.: (312) 767-5180
Email: afata@kmllp.com
amaneiro@kmllp.com

Counsel for Plaintiff King Kullen Grocery Co., Inc.

/s/ Matthew W. Ruan

Matthew W. Ruan (MN #033909X)
**FREED KANNER LONDON & MILLEN
LLC**
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Tel: (224) 632-4500
mruan@fklmlaw.com

/s/ Stuart G. Gross

Stuart G. Gross
GROSS KLEIN PC
The Embarcadero
Pier 9, Suite 100
San Francisco, CA 94111
Telephone: (415) 671-4628
sgross@grosskleinlaw.com

Counsel for Plaintiff Piala LLC

/s/ Jon A. Tostrud

Jon A. Tostrud (MN Bar No. 199502)
Anthony M. Carter (*pro hac vice forthcoming*)
TOSTRUD LAW GROUP, P.C.
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 278-2600
Facsimile: (310) 278-2640
jtostrud@tostrudlaw.com
acarter@tostrudlaw.com

Don Barrett (*pro hac vice forthcoming*)
Sarah Sterling Aldridge (*pro hac vice
forthcoming*)

Katherine Barrett Riley (*pro hac vice
forthcoming*)

BARRETT LAW GROUP, P.A.

P.O. Box 927

404 Court Square North

Lexington, Mississippi 39095-0927

Telephone: (662) 834-9168

Facsimile: (662) 834-2628

donbarrett@barrettlawgroup.com

saldridge@barrettlawgroup.com

kbriley@barrettlawgroup.com

J. Barton Goplerud (*pro hac vice forthcoming*)

**SHINDLER, ANDERSON, GOPLERUD &
WEESE, P.C.**

5015 Grand Ridge Drive

Suite 100

West Des Moines, IA 50265

Telephone: (515) 223-4567

goplerud@sagwlaw.com

marty@sagwlaw.com

*Counsel for Plaintiffs Quarterback Club and
Gladys' Restaurant, LLC (d/b/a Gladys')*

s/ Vildan A. Teske

Vildan A. Teske (MN#241404)

TESKE LAW PLLC

80 South Eighth Street, Suite 900

Minneapolis, MN 55402

Tel: (612) 746-1558

teske@teskelaw.com

Kevin Landau

Archana Tamoshunas

Miles Greaves

TAUS, CEBULASH & LANDAU, LLC

123 Williams St., Suite 1900A

New York, NY 10038

Telephone: (212) 931-0704

klandau@tcllaw.com

atamoshunas@tcllaw.com

mgreaves@tcllaw.com

***Counsel for Plaintiff JM Hospitality Group,
LLC***

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518

sraiter@larsonking.com

Michael J. Flannery (*pro hac vice*)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive

Second Floor

St. Louis, MO 63141

Telephone: (314) 226-1015

mflannery@cuneolaw.com

Cody McCracken (*pro hac vice*)

Lissa Morgans (*pro hac vice*)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave. NW

Suite 200

Washington, DC 20016

Telephone: 202.789.3960

Facsimile: 202.589.1813

cmccracken@cuneolaw.com

lmorgans@cuneolaw.com

***Counsel for Plaintiff UP at 4, Inc. (d/b/a Great
Harvest Bread Co. (Duluth, MN))***

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518
sraiter@larsonking.com

Michael J. Flannery (*pro hac vice*)
CUNEO GILBERT & LADUCA, LLP
Two City Place Drive
Second Floor
St. Louis, MO 63141
Telephone: (314) 226-1015
mflannery@cuneolaw.com

Cody McCracken (*pro hac vice*)
Lissa Morgans (*pro hac vice*)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave. NW
Suite 200
Washington, DC 20016
Telephone: 202.789.3960
Facsimile: 202.589.1813
cmccracken@cuneolaw.com
lmorgans@cuneolaw.com

J. Barton Goplerud (*pro hac vice*)
SHINDELAR, ANDERSON, GOPLERUD & WEESE, P.C.
5015 Grand Ridge Drive, Suite 100
West Des Moines, IA 50265
Telephone: (515) 223-4567
goplerud@sagwlaw.com

Jon Tostrud (MN#0251768)
Anthony Carter (*pro hac vice*)
TOSTRUD LAW GROUP, PC
1925 Century Park East
Suite 2100
Los Angeles, CA 90067
Telephone: (310) 278-2600
jtostrud@tostrudlaw.com
acarter@tostrudlaw.com

*Counsel for Plaintiff Wilson Coffee House,
LLC (d/b/a Linden Street Coffee House)*

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518

sraiter@larsonking.com

Michael J. Flannery (*pro hac vice*)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive

Second Floor

St. Louis, MO 63141

Telephone: (314) 226-1015

mflannery@cuneolaw.com

Daniel M. Cohen

Cody McCracken (*pro hac vice*)

Lissa Morgans (*pro hac vice*)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave. NW

Suite 200

Washington, DC 20016

Telephone: 202.789.3960

Facsimile: 202.589.1813

danielc@cuneolaw.com

cmccracken@cuneolaw.com

lmorgans@cuneolaw.com

Counsel for Plaintiff Portland Hunt-Alpine Club, LLC

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518

sraiter@larsonking.com

Michael J. Flannery (*pro hac vice*)

CUNEO GILBERT & LADUCA, LLP
Two City Place Drive
Second Floor
St. Louis, MO 63141
Telephone: (314) 226-1015
mflannery@cuneolaw.com

Cody McCracken (*pro hac vice*)
Lissa Morgans (*pro hac vice*)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave. NW
Suite 200
Washington, DC 20016
Telephone: 202.789.3960
Facsimile: 202.589.1813
cmccracken@cuneolaw.com
lmorgans@cuneolaw.com

Counsel for Plaintiff 2nd Pit LLC